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BEFORE THE

Federal Communications Commission

Federal Communications Commission
Office of the Secretary

WASHINGTON, D. C. 20554

In re Applications of

CRYSTAL CLEAR COMMUNICATIONS, INC.

THE RADIO MINISTRIES BOARD OF VICTORY
CHRISTIAN CENTER ASSEMBLY OF GOD, INC.

For a Construction Permit for a New
FM Station on Channel 240A
Seelyville, Indiana

MM Docket No. 92-62

File No. BPH-901214MA

File NO. BPH-901217MJ

To: Administrative Law Judge John M. Frysiak

PETITION FOR LEAVE TO AMEND

The Radio Ministries Board of Victory Christian Center Assembly of God, Inc. ("Radio Board"), by counsel, hereby moves to amend its above-referenced application for a new FM broadcast station at Seelyville, Indiana to include the attached amendment. In support thereof, the following is stated:

The attached amendment is being filed pursuant to Section 1.65 of the rules, requiring applicants to maintain the continuing accuracy and completeness of information furnished in their pending applications. The amendment reflects that Pastor Larry D. Richmond is now the third permanent member of the Radio Board. As Radio Board reported in an amendment filed in January 1992, the former pastor of Victory Christian Center Assembly of God, Inc. ("Victory"), Larry G. Riley, resigned as Victory's pastor and chairman of the Radio Board effective December 16, 1991. Jerry Morris was appointed to temporarily fill the vacant Radio Board

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position. Pastor Richmond has assumed that position as a permanent Radio Board member and has become Radio Board's chairman.¹

The attached amendment also modifies Radio Board's integration proposal (Exhibit No. 3) to reflect the fact that neither Pastor Richmond nor Janice Bender now propose to integrate at the Seelyville station.² Nancy Rooney, the third member of the Radio Board, still plans to integrate as the station's program director. The integration statement also has been updated to reflect changes in Ms. Rooney's proposal, such as a change in her street address, termination of her part-time broadcast employment and updates of civic and/or media-related activities. Those changes do not result in a comparative upgrading and none is sought.

The attached amendment also includes a revised "media interests" exhibit (Exhibit No. 1-A) to reflect the fact that Ms. Rooney, in line with her prior divestiture pledge, has terminated her part-time non-management employment with WWVR-FM, West Terre Haute, Indiana. The "media interests" exhibit also reports, out of an abundance of caution, that Ms. Rooney is now producing, and

¹ Thus, page 1 of FCC Form 301 is modified to substitute Pastor Richmond's name as Victory's contact and pages 3(A) and 3(B), concerning parties to the application, are amended to reflect his position on the Board, as well as Ms. Rooney's new street address. Exhibits Nos. 1 and 3 also have been revised and reflect Pastor Richmond's position on the Radio Board.

² Since no Radio Board member proposes to integrate as the station's general manager, page 2 of the FCC Form 396-A also has been changed, to remove Pastor Riley's name as the station's general manager.

serving as on-air talent for, spots for Victory run on a local radio station.³

Finally, the attached amendment reports that on April 29, 1992 the Federal Aviation Administration ("FAA") issued a letter advising Radio Board that its proposal must be modified in order to eliminate certain air hazard concerns or the FAA will issue a determination that the construction would constitute a hazard to air navigation. The FAA gave Radio Board until May 27, 1992 to respond to its April 29, 1992 letter.


The attached amendment is required to be filed pursuant to Section 1.65 of the Commission's rules. The applicant does not seek any comparative upgrading from its acceptance.


WHEREFORE, In light of the foregoing, and good cause having been shown, it is requested that this Petition for Leave to Amend be GRANTED and the attached amendment ACCEPTED.

³ The exhibit also updates information regarding the production of three weekly television programs by the Greater Terre Haute Church Federation, to reflect that one of those programs is now produced in cooperation with WBAK-TV, Terre Haute.

Respectfully submitted,

THE RADIO MINISTRIES BOARD OF VICTORY
CHRISTIAN CENTER OF GOD, INC.

By 
HARRY C. MARTIN

By 
CHERYL A. KENNY
Its Counsel

Reddy, Begley & Martin
1001 22nd Street, N.W.
Suite 350
Washington, D.C. 20037

May 12, 1992

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Federal Communications Commission
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BEFORE THE

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WASHINGTON, D. C. 20554

In re Application of)	MM Docket No. 92-62
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THE RADIO MINISTRIES BOARD OF)	File No. BPH-901217MJ
VICTORY CHRISTIAN CENTER)	
ASSEMBLY OF GOD, INC.)	
)	
For a Construction Permit)	
for a new FM Station on)	
Channel 240A)	
Seelyville, Indiana)	

AMENDMENT

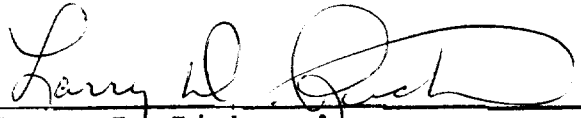
The Radio Ministries Board of Victory Christian Center Assembly of God, Inc. ("Radio Board") hereby amends its above-referenced application for a new FM broadcast station at Seelyville, Indiana as follows:

- (a) To substitute the attached page 1 of FCC Form 301 for the corresponding page currently on file.
- (b) To substitute the attached pages 3(A) and 3(B) of FCC Form 301, concerning parties to the application, for the corresponding pages currently on file.
- (c) To substitute the attached Exhibits 1, 1-A and 3 for the corresponding Exhibits 1, 1-A and 3 currently on file.
- (d) To substitute the attached page 2 of FCC Form 396-A for the corresponding page currently on file.
- (e) To report that on April 29, 1992 the Federal Aviation Administration ("FAA") issued a letter advising the applicant that if its proposal is not modified to eliminate air hazard concerns, it will issue a formal determination that Radio Board's planned construction at its currently proposed transmitter site would constitute a hazard to air navigation. The FAA gave the applicant until May 27, 1992 to respond to the April 29, 1992 letter.

2

Executed this 8th day of May, 1992.

THE RADIO MINISTRIES BOARD
OF VICTORY CHRISTIAN CENTER
ASSEMBLY OF GOD, INC.



Larry D. Richmond
Chairman

APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION

For COMMISSION Fee Use Only	FEE NO:	For APPLICANT Fee Use Only
	FEE TYPE:	Is a fee submitted with this application? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	FEE AMT:	If fee exempt (see 47 C.F.R. Section 1.1112), indicate reason therefor (check one box): <input type="checkbox"/> Noncommercial educational licensee <input type="checkbox"/> Governmental entity
	ID SEQ:	FOR COMMISSION USE ONLY FILE NO.

Section I - GENERAL INFORMATION

1. Name of Applicant The Radio Ministries Board of Victory Christian Center Assembly of God, Inc.			Send notices and communications to the following person at the address below:		
Street Address or P.O. Box 9400 Wabash Avenue			Name Pastor Larry D. Richmond, at address opposite cc: Reddy, Begley & Martin		
City Terre Haute	State IN	ZIP Code 47803	Street Address or P.O. Box 1001 22nd Street, N.W., Suite 350	City Washington	State D.C.
Telephone No. (Include Area Code) (812) 877-1502			ZIP Code 20037		
Telephone No. (Include Area Code) (812) 877-1502			Telephone No. (Include Area Code) (202) 659-5700		

2. This application is for: ☐ AM ☒ FM ☐ TV

(a) Channel No. or Frequency 240

(b) Principal Community	City	State
	Seelyville	IN

(c) Check one of the following boxes:

☒ Application for NEW station

☐ MAJOR change in licensed facilities; call sign: _____

☐ MINOR change in licensed facilities; call sign: _____

☐ MAJOR modification of construction permit; call sign: _____

File No. of construction permit: _____

☐ MINOR modification of construction permit; call sign: _____

File No. of construction permit: _____

☐ AMENDMENT to pending application; Application file number: _____

NOTE: It is not necessary to use this form to amend a previously filed application. Should you do so, however, please submit only Section I and those other portions of the form that contain the amended information.

3. Is this application mutually exclusive with a renewal application? ☐ Yes ☒ No

If Yes, state:

Call letters	Community of License	
	City	State

Section 11 - LEGAL QUALIFICATIONS (Page 2)

6. List the applicant, parties to the application and non-party equity owners in the applicant. Use one column for each individual or entity. Attach additional pages if necessary.

(Read carefully - The numbered items below refer to line numbers in the following table.)

1. Name and residence of the applicant and, if applicable, its officers, directors, stockholders, or partners (if other than individual also show name, address and citizenship of natural person authorized to vote the stock). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and partners.
2. Citizenship.
3. Office or directorship held.
4. Number of shares or nature of partnership interests.
5. Number of votes.
6. Percentage of votes.
7. Other existing attributable interests in any broadcast station, including the nature and size of such interests.
8. All other ownership interests of 5% or more (whether or not attributable), as well as any corporate officership or directorship, in broadcast, cable, or newspaper entities in the same market or with overlapping signals in the same broadcast service, as described in 47 C.F.R. Section 73.3555 and 76.501, including the nature and size of such interests and the positions held.

1.	The Radio Ministries Board of Victory Christian Center Assembly of God, Inc. 9400 Wabash Avenue Terre Haute, IN 47803	Larry D. Richmond 111 Phoenix Drive Terre Haute, IN	Janice Bender 7358 Wabash Avenue Terre Haute, IN 47803
2.	N/A	U.S.A.	U.S.A.
3.	N/A	Chairman of the Board	Board Member
4.	3 Board Members, each with 1 vote	1 vote out of 3	1 vote out of 3
5.	3 Votes	1	1
6.	--	33 1/3%	33 1/3%
7.	None	None	None
8.	None	None	None

Section 11 - LEGAL QUALIFICATIONS (Page 2)

6. List the applicant, parties to the application and non-party equity owners in the applicant. Use one column for each individual or entity. Attach additional pages if necessary.

(Read carefully - The numbered items below refer to line numbers in the following table.)

1. Name and residence of the applicant and, if applicable, its officers, directors, stockholders, or partners (if other than individual also show name, address and citizenship of natural person authorized to vote the stock). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and partners.
2. Citizenship.
3. Office or directorship held.
4. Number of shares or nature of partnership interests.
5. Number of votes.
6. Percentage of votes.
7. Other existing attributable interests in any broadcast station, including the nature and size of such interests.
8. All other ownership interests of 5% or more (whether or not attributable), as well as any corporate officership or directorship, in broadcast, cable, or newspaper entities in the same market or with overlapping signals in the same broadcast service, as described in 47 C.F.R. Section 73.3555 and 76.501, including the nature and size of such interests and the positions held.

1.	Nancy K. Rooney 7742 N. 42nd Street Terre Haute, IN 47805		
2.	U.S.A.		
3.	Board Member		
4.	1 vote out of 3		
5.	1		
6.	33 1/3%		
7.	None		
8.	None		

The Radio Ministries Board of Victory Christian Center Assembly of God, Inc. ("Radio Board") is a three-member board of Victory Christian Center Assembly of God, Inc. ("Victory"), a non-stock, non-profit Indiana corporation. The Radio Board, which was established on December 5, 1990 by a nearly unanimous vote of the congregation, is empowered to oversee all aspects of operation of the proposed radio station. Members serve four-year terms. The current members of the Radio Board are Pastor Larry D. Richmond, Janice Bender and Nancy Rooney. Pastor Richmond is chairman of the Radio Board.

MEDIA INTERESTS

Neither Radio Board nor its members has any ownership interest in, holds any directorship or officership with, or otherwise has an "interest in" any broadcast station or other media of mass communications.

Out of an abundance of caution, Radio Board previously reported that Nancy Rooney was working in a part-time non-management position for United Broadcasting Company, licensee of WWVR-FM, West Terre Haute, Indiana, where she was an announcer, sales person, and program host and producer, and that she would terminate that employment prior to commencement of program tests of Radio Board's Seelyville station. In line with that pledge, Ms. Rooney terminated that employment in October or November 1991.

Also out of an abundance of caution, Radio Board reports that (a) Ms. Rooney is a member of the Board of Directors, and serves on the Communications Committee of, the Greater Terre Haute Church Federation which produces three weekly television programs entitled "Religion in the News," "Faith To Live By" and "Religious Heritage," in cooperation with WBAK-TV, Terre Haute (which airs "Faith to Live By" and WTWO-TV, Terre Haute (which airs "Religious Heritage" and "Religion in the News"). As a volunteer, Ms. Rooney has helped in some areas of production with respect to those programs and is a newscaster and music coordinator of "Religion in the News"; (b) Ms. Rooney makes periodic appearances as a guest on interview programs and as a guest soloist for programs such as "Joyful Noise" and "Open Bible," all broadcast on Station WBAK-TV;

(c) as a volunteer, Ms. Rooney produces and serves as on-air talent for 30-second spots for Victory Christian Center Assembly of God, Inc., run on radio station WTHI-FM; and (d) as a volunteer, Ms. Rooney writes a weekly column, "Gospel Notes," for the Terre Haute Tribune Star.

INTEGRATION STATEMENT

The Radio Board is a three member board of the Victory Christian Center Assembly of God, Inc. ("Victory"), a non-stock, non-profit Indiana corporation. The Radio Board is empowered to oversee all aspects of operation of the proposed Seelyville radio station. Members serve four-year terms. The members of the Radio Board are Pastor Larry D. Richmond, Janice Bender and Nancy K. Rooney. Each member is entitled to one vote. Pastor Richmond is Chairman of the Radio Board.

Pastor Richmond and Ms. Bender will not seek credit for integration at the proposed station. Nancy Rooney, however proposes to integrate as follows:

Nancy Rooney proposes to work full-time (a minimum of 40 hours per week), on a daily basis, as the station's Program Director. As such, she will be in charge of all non-public affairs programming at the station. Ms. Rooney will directly supervise any program department staff and will report directly to the station's general manager.

Ms. Rooney is a female, and to the extent available, credit will be sought for her female status.

Ms. Rooney is currently self-employed as the sole proprietor of a "Rent-a-Maid." She spends 20 to 40 hours per week on that business. Ms. Rooney plans to turn the Rent-a-Maid service over to her daughter and terminate her activities with Rent-a-Maid when she begins working at the Seelyville station. In the event Ms. Rooney has any other employment at the time she begins working

at the Seelyville station, she will terminate that employment as well. Ms. Rooney occasionally receives a modest fee for being a speaker for an organization or for ministering to a group. She will curtail such activities, plus her volunteer activities, as necessary so as not to interfere with her working full-time at the Seelyville station.

Radio Board seeks credit for Ms. Rooney's residence within the proposed service area from November 1978 to the present time. During that time, and continuing to the present, Ms. Rooney has resided at 7742 North 42nd Street in Terre Haute.¹ She plans to continue residing in the service area while integrated at the proposed station.

Additionally, Radio Board seeks credit for Ms. Rooney's civic involvement in the proposed service area, including the following:

1962-1965: During her high school years at Rockville High School in Rockville, Indiana (within the service area), Ms. Rooney was active in such groups as the dance band, pep band, concert/marching band, choir, FHA, and French Club. She also served as class Secretary at Rockville High School during her sophomore and junior years. Her high school activities required two-three hours per week.

1972-1975: Ms. Rooney was a member of a Rockville, Indiana community theater group, Parke Players. She was involved in performing and in business management, including ticket sales and public relations. She spent about 20-50 hours per season on these activities.

¹ Previously, Ms. Rooney's address was designated as 7612 North 42nd Street. A new addressing system has been adopted to enhance local "911" service resulting in the street number change. However, Ms. Rooney remains at the same physical location.

1971-76: Ms. Rooney was active as a member of the Parent-Teacher Organization at Rockville Elementary School in Rockville, Indiana, and Rio Grande Elementary School in Terre Haute, both located within the service area. She helped in planning and executing fundraisers, talent shows, book fairs and other Parent-Teacher Organization functions. She spent 10-20 hours per week in these Parent-Teacher Organization activities.

1974-1975: Ms. Rooney was a Den Mother for Cub Scouts located in Rockville, Indiana. This activity took about three hours per week.

1975-1978: Ms. Rooney was active as a parent/helper with, alternately, Webelos, Boy Scouts, Brownies and Girl Scouts troops located in Rockville, Indiana. These activities totalled about two hours per week.

1971-1989: Ms. Rooney helped with fundraisers, transported players and worked concession stands for the Little League and Babe Ruth Baseball Teams located at Rockville and Terre Haute. She spent three-five hours per week in these activities during the playing seasons.

1977-1978: Ms. Rooney helped umpire, helped with fundraisers, transported players and worked at concession stands for the girl's softball team located in Rockville. About three hours per week were devoted to these activities during the playing seasons.

1976-1977: For two years, Ms. Rooney was Co-Chairman of the United Methodist Women's Service Circle of the United Methodist Church in Rockville, Indiana.

1979-1982: Ms. Rooney was a foster mother for four children during this period.

1983-1986: During these years, in conjunction with the Parent-Teacher Organization, Ms. Rooney often volunteered as the emcee for various programs and/or provided or operated the sound system for stage performances of contestants for elementary school talent shows at Rio Grande Elementary School in Terre Haute. She spent about five hours per event.

1985-1986: For two years, Ms. Rooney was Choir Director of the Fontanet United Brethren in Christ Church, northeast of Terre Haute. This activity required six-seven hours per week.

June, 1986-December 1990: Ms. Rooney was a member of the gospel group, "Charity," based in Terre Haute. The group traveled and ministered through the three-state area. She spent 10-25 hours per week on this activity.

1982-Present: Since 1982, Ms. Rooney has been the Gospel Day Coordinator, coordinating Gospel Day, which occurs annually on the Memorial Day weekend, for the city of Terre Haute's Wabash Valley Festival. This event involves over 20 gospel groups and soloists during the day, with the evening's events culminating in a large patriotic extravaganza with fireworks. She has spent about 30-40 hours on this activity, in total, per year.

1982-Present: On a number of occasions, Ms. Rooney has been asked to sing at Terre Haute city events, including ethnic festivals, art festivals and the Mayor's birthday parties. She is often asked to lead city-wide praise gatherings. She has spent five-ten hours per year on these activities.

1988-Present: As a volunteer, Ms. Rooney has performed all computer work for the Hisplace Christian Activity Center in Terre Haute, an organization which provides recreational facilities and events for the Wabash Valley area. She rejoined the Board of Directors of Hisplace in early 1991. She became Treasurer of the group in January 1992. She has spent about two hours per week on Hisplace activities.

August, 1990-Present: Ms. Rooney has been a member of the Board of Directors of the Greater Terre Haute Church Federation. Among the organization's functions are planning activities where members of diverse churches or faiths may come together; promoting programs that benefit needy people in the Terre Haute area, including food pantry and counseling programs; and promoting communications between churches, the

Federation and the community. Ms. Rooney is also a member of the Federation's Communications Committee, which publicizes the federation and its activities, is responsible for a newsletter, a directory of churches and religious organizations, and produces three television broadcasts, "Faith to Live By," "Religious Heritage" and "Religion in the News," in cooperation with NBC affiliate WTWO-TV (which currently airs "Religious Heritage" and "Religion in the News") and with ABC affiliate WBAK-TV (which currently airs "Faith to Live By"). Both are Terre Haute stations. Ms. Rooney assists in some areas of production for the programs aired on WTWO-TV and is a newscaster and music coordinator for "Religion in the News." She spends about two-three hours per week on Federation activities.

1981-Present: Ms. Rooney has been a speaker and ministered in music for various organizations and church groups in the service area through such groups as the Christian Women's Council, Women's Aglow and Full Gospel Businessmen's Fellowship. She spends 20-30 hours per year on these activities.

Radio Board also will seek credit for Ms. Rooney's past broadcast experience. As noted above, Ms. Rooney is currently a newscaster and music coordinator for "Religion in the News," a weekly half-hour program produced by the Greater Terre Haute Church Federation and Station WTWO-TV and broadcast on WTWO-TV, and helps with production of two other Federation programs.

Additionally, from 1988 to October or November 1991, Ms. Rooney has worked part-time (12-30 hours per week) for United Broadcasting Company, licensee of FM Broadcast Station WWVR, West Terre Haute, Indiana. In that non-management position as on-air announcer and sales agent, Ms. Rooney's duties included announcing, sales (acquiring and servicing accounts), producing commercial and public service announcements, and hosting and producing two weekly

radio programs. The first was entitled "Wabash Valley Report," which was a live interview program featuring Wabash Valley residents discussing pressing issues in their communities. (Seelyville is located in the Wabash Valley area.) The other, entitled "New Song Ministries Broadcast," was a 25-minute program wherein Ms. Rooney highlighted service area music ministries, including their music and giving concert schedules and booking information.

Since 1988, Ms. Rooney has made periodic appearances on interview programs and has been a guest soloist for such programs as "Joyful Noise" and "Open Bible," broadcast on Station WBAK-TV. Ms. Rooney was recently approached about being a guest (on an unpaid, volunteer basis) for a program on the Trinity Broadcasting Network.

Additionally, on a volunteer basis, since September 1, 1989, Ms. Rooney has been a special feature writer for the Terre Haute Tribune Star, writing a weekly newspaper column entitled, "Gospel Notes."

Since February 1992 Ms. Rooney has been helping to develop a media ministry at Victory, on a volunteer basis. Since April 1992, one of her functions has been to produce and serve as on-air talent for 30-second spots for Victory which are run on Terre Haute radio station WTHI-FM on Sunday mornings. She spends about 1-2 hours per week on helping with the media ministry.

Ms. Rooney's primary commitment will be to her full-time position at the Seelyville station. Therefore, non-employment

activities, including her volunteer activities, most of which occur during evening and weekend hours, will be curtailed as needed to effectuate her full-time employment at the Seelyville station.

GUIDELINES TO THE MODEL EEO PROGRAM

The model EEO program adopted by the Commission for construction permit applicants, assignees and transferees contains five sections designed to assist the applicant in establishing an effective EEO program for its station. The specific elements which should be addressed are as follows:

I. GENERAL POLICY

The first section of the program should contain a statement by the applicant that it will afford equal employment opportunity in all personnel actions without regard to race, color, religion, national origin or sex, and that it has adopted an EEO program which is designed to fully utilize the skills of qualified minorities and women in the relevant available labor force.

II. RESPONSIBILITY FOR IMPLEMENTATION

This section calls for the name (if known) and title of the official who will be designated by the applicant to have responsibility for implementing the station's program.

III. POLICY DISSEMINATION

The purpose of this section is to disclose the manner in which the station's EEO policy will be communicated to employees and prospective employees. The applicant's program should indicate whether it: (a) intends to utilize an employment application form which contains a notice informing job applicants that discrimination is prohibited and that persons who believe that they have been discriminated against may notify appropriate governmental agencies; (b) will post a notice which informs job applicants and employees that the applicant is an equal opportunity employer and that they may notify appropriate governmental authorities if they believe that they have been discriminated against; and (c) will seek the cooperation of labor unions, if represented at the station, in the implementation of its EEO program and in the inclusion of nondiscrimination provisions in union contracts. The applicant should also set forth any other methods it proposes to utilize in conveying its EEO policy (e.g., orientation materials, on-air announcements, station newsletter) to employees and prospective employees.

IV. RECRUITMENT

The applicant should specify the recruitment sources and other techniques it proposes to use to attract qualified minority and female job applicants. Not all of the categories of recruitment sources need be utilized. The purpose of the listing is to assist the applicant in developing specialized referral sources to establish a pool of qualified minorities and women who can be contacted as job opportunities occur. Sources which subsequently prove to be nonproductive should not be relied on and new sources should be sought.

V. TRAINING

Training programs are not mandatory. Each applicant is expected to decide, depending upon its own individual situation, whether a training program is feasible and would assist in its effort to increase the available pool of qualified minority and female applicants. Additionally, the applicant may set forth any other assistance it proposes to give to students, schools or colleges which is designed to be of benefit to minorities and women interested in entering the broadcasting field. The beneficiary of such assistance should be listed, as well as the form of assistance, such as contributions to scholarships, participation in work study programs, and the like.

MODEL EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

I. GENERAL POLICY

It will be our policy to provide employment opportunity to all qualified individuals without regard to their race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It will also be our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin or sex.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have adopted an Equal Employment Opportunity Program which includes the following elements:

II. RESPONSIBILITY FOR IMPLEMENTATION

(Name/Title) General Manager will be responsible for the administration and implementation of our Equal Employment Opportunity Program. It will also be the responsibility of all persons making employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program is adhered to and that no person is discriminated against in employment because of race, color, religion, national origin or sex.

III. POLICY DISSEMINATION

To assure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following communication efforts will be made:

CERTIFICATE OF SERVICE

I, Hilary W. Allen, hereby certify that on this 12th day of May, 1992, copies of the foregoing **PETITION FOR LEAVE TO AMEND** were hand delivered or mailed, first class, postage prepaid, to the following:

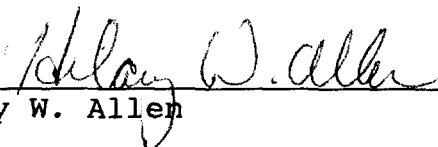
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Hilary W. Allen

* HAND DELIVERED